

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

| | | |
|--------------------------|---|---------------------------|
| UNITED STATES OF AMERICA |) | |
| |) | |
| v. |) | CASE NO.: 8:24-CR-211-TDC |
| |) | |
| HOAU-YAN WANG, |) | |
| |) | |
| Defendant. |) | |

**DEFENDANT HOAU-YAN WANG’S MOTION IN LIMINE
TO EXCLUDE DIGITAL IMAGES OF WESTERN BLOTS**

For the reasons set forth in the accompanying Brief in Support, Defendant Dr. Hoau-Yan Wang respectfully moves in limine for an order excluding any testimony, exhibits, or argument referring to images obtained from him as “source images,” including so-called “raw” or “white box” images, of NIH grant application figures. Unless and until the Government can first establish authenticity under Federal Rule of Evidence 901 outside the presence of the jury, such references would lack foundation, risk misleading the jury, and cause unfair prejudice.

Dated: September 24, 2025

Respectfully submitted,

/s/ Joanne Zimolzak
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CERTIFICATE OF SERVICE

I hereby certify that on the 24th day of September, 2025, I filed the foregoing Motion in Limine and Brief in Support using the Court's CM/ECF system. The CM/ECF system sent a "Notice of Electronic Filing" to all counsel of record who have entered an appearance in this matter.

Dated: September 24, 2025

Respectfully Submitted,

/s/ Joanne Zimolzak

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